

# *EXHIBIT 17*

***UNREDACTED VERSION  
OF DOCUMENT SOUGHT  
TO BE SEALED***

# *EXHIBIT 17*



1 PLEASE TAKE NOTICE THAT, pursuant to Rule 34 of the Federal Rules of Civil  
2 Procedure and the expedited rules and proceedings in this case, counsel for defendant Otto  
3 Trucking LLC and one or more of Otto Trucking's experts (and Special Master John Cooper if he  
4 so wishes) will inspect Waymo's network, including how laptops interact with Waymo's network,  
5 including the SVN server, and the metadata generated from those interactions. As part of the  
6 inspection, Otto Trucking will need access to the following:

- 7 1. A Google-issued laptop (ThinkPad T430S US) that
  - 8 a. Has a standard Google Windows image, the same as what would have been  
9 used in that organization on December 11, 2015;
  - 10 b. Runs versions of their endpoint software including [REDACTED] and  
11 [REDACTED] in use during the time period in question;
  - 12 c. Contains a user profile to be configured as Local Administrator on that laptop;
  - 13 d. Has a group or user policy that matches that of Anthony Levandowski just prior  
14 to his departure. (That means access to all the same resources that Levandowski  
15 had);
- 16 2. Administrative access on the [REDACTED] client that allows user to customize rules;
- 17 3. Access to Tortoise SVN software on removable media such that Otto Trucking's  
18 can install TortoiseSVN while connected to the Waymo network;
- 19 4. Access to the entire SVN network to the same extent that was Anthony  
20 Levandowski was provided on December 11, 2015;
- 21 5. Provide the same version of [REDACTED] software on a USB removable media  
22 device in order to allow imaging of the laptop in the same manner as was done by  
23 the Google Security team;
- 24 6. Access to [REDACTED] log  
25 files associated to that laptop computer and created during the time period this  
26 work is being performed;
- 27 7. Access to any software and laptop OS versions to replicate the above operations as  
28 of December 22, 2015, or documentation that contains information about any

1 modifications to the versions, settings or systems between the time of the original  
2 capture and our test so that we can account for variances; and

- 3 8. Waymo's logging software or systems capable of monitoring downloading activity  
4 by Google or Waymo employees not discussed in Mr. Brown's declaration be  
5 disclosed and made available for testing.

6 Local copies of any files to which Waymo provides access as part of this inspection will be  
7 deleted at the end of the inspection. However, Otto Trucking would maintain a copy of any logs  
8 and metadata created as part of this inspection.

9 The inspection shall take place on August 17, 2017 beginning at 9 a.m.

10 Dated: August 7, 2017

Respectfully submitted,

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**PROOF OF SERVICE.**

I am an attorney at the law firm of Goodwin Procter, LLP, whose address is 601 South Figueroa Street, 41<sup>st</sup> Floor, Los Angeles, CA 90017. I am over the age of 18 and not a party to the within action.

**On August 7, 2017**, I caused the following documents to be served on all counsel of record via electronic mail, pursuant to the agreement between the parties:

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21  (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an  
agreement of the parties to accept service by e-mail or electronic transmission, I caused  
the documents to be sent to the persons at the e-mail addresses listed. I did not receive,  
within a reasonable time after the transmission, any electronic message or other  
indication that the transmission was unsuccessful.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on **August 7, 2017**, at Los Angeles, California.

26 \_\_\_\_\_  
27 Hong-An Vu  
(Type or print name)

\_\_\_\_\_  
/s/Hong-An Vu  
(Signature)